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November 9, 2015

**VIA U.S. MAIL AND E-MAIL**

Henry Guzman  
Assistant Regional Counsel  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region II  
290 Broadway, 17th Floor  
New York, NY 10007-1866

**Re: Notice of Potential Liability and Request for Information Pursuant to 42 U.S.C. §§ 9607(a) and 9604(e) of the Comprehensive Environmental Response, Compensation and Liability Act, San German Ground Water Contamination Site, San German, Puerto Rico**

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Dear Mr. Guzman:

Hewlett-Packard Company ("Hewlett-Packard") received the U.S. EPA Notice of Potential Liability and Request for Information Pursuant to CERCLA, Sections 107(a) and 104(e) pertaining to the San German Ground Water Contamination Site, San German, Puerto Rico (the "Site") dated September 16, 2015 (the "Request") regarding two lots located within the Retiro Industrial Park in San German, Puerto Rico, Project S-0551-0-60 is reported to be currently leased to CCL Label Inc. (the "CCL Lot") and Project S-0373-0-56 is reported to be most recently leased to Baytex International Corp. (the "former Baytex Lot"). EPA alleges both were leased by Digital Equipment Corporation ("DEC").<sup>1</sup>

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<sup>1</sup> As described more fully herein, the two referenced lots were leased by Digital Equipment Corporation de Puerto Rico, a wholly-owned subsidiary of DEC, and not by DEC.

Since receiving the Request, Hewlett-Packard changed its name to HP Inc. Subject to both the general and specific objections noted below, and without waiving these or other available objections or privileges, HP Inc. is providing this response to the Request consistent with the extension of 45 days (to November 9) that you granted to Karen Davis of my office. As described below, HP Inc. believes that it is not a responsible party at the Site.

### **GENERAL RESPONSIVE STATEMENT AND OBJECTIONS**

In response to the Request, HP Inc. has reviewed information provided by EPA and has researched its corporate history including its 2002 merger with Compaq Computer Company (“Compaq”) and Compaq’s 1998 acquisition of DEC. HP Inc. has determined that Digital Equipment Corporation de Puerto Rico (“Digital-PR”), not DEC, separately leased the CCL Lot and the former Baytex Lot in the Retiro Industrial Park from the Puerto Rico Industrial Development Company (“PRIDCO”). Digital-PR was dissolved in June 1995 in accordance with Delaware’s General Corporation Law, three years prior to Compaq’s acquisition of DEC. DEC and Digital-PR were separate corporate entities<sup>2</sup> and DEC is not a successor in interest to Digital-PR solely by virtue of its status as a shareholder of the dissolved corporation.<sup>3</sup> It therefore follows that neither Compaq nor HP Inc. are successors to Digital-PR as a result of either Compaq’s 1998 acquisition of DEC or Hewlett-Packard’s subsequent 2002 merger with Compaq. Therefore, HP Inc. is not potentially responsible for the Site.

The enclosed information is based on our investigation to date. Preparation of this response involved review of historical documents which were difficult to identify and time consuming to locate. Responding to this Request under the time constraints involved was

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<sup>2</sup> As found by then-Chief Judge Perez-Giminez of the United States District Court for the District of Puerto Rico, DEC and Digital-PR had a genuine parent-subsidary relationship and are separate and distinct corporate entities. *Alvarado Morales v. Digital Equipment Corp.*, 669 F.Supp. 1173, 1177 (D.P.R. 1987) (“[Digital-PR] implements its own personnel policies...without [DEC’s] involvement. [DEC and Digital-PR] have separate corporate structures, facilities, work forces, business records, bank accounts, tax returns, financial statements, budgets, and corporate reports. They have separate and distinct Boards of Directors.”).

<sup>3</sup> Corporations are presumed to be legal entities separate from their shareholders and thus, shareholders are generally not liable for corporate debts and liabilities. *See, e.g., Pearson v. Component Tech. Corp.*, 247 F.3d 471, 484 (3d Cir. 2001) (“The corporate form was created to allow shareholders to invest without incurring personal liability for the acts of the corporation. These principles are equally applicable when the shareholder is, in fact, another corporation, and hence, mere ownership of a subsidiary does not justify the imposition of liability on the parent.”); *Situ v. O’Neill*, 2015 WL 5092877, \*13, --- F.Supp. 3d --- (D.P.R. Aug. 25, 2015); *Colon v. Blades*, 757 F.Supp. 2d 107, 109 (D.P.R. 2010); *Wadsworth, Inc. v. Schwarz-Nin*, 951 F.Supp. 314, 320 (D.P.R. 1996).

particularly challenging since the subject matter of the Request involved historical operations by a company (Digital-PR) that dissolved three years before Compaq acquired DEC and therefore was not acquired by Compaq, and thus never merged into Hewlett-Packard, now known as HP Inc. Relevant information discovered to date is summarized herein and attached hereto. HP Inc. reserves the right to amend and/or supplement this response if other relevant and necessary information is discovered. HP Inc. also reserves, and does not waive, any and all rights, privileges and defenses that it may have related to the Request and this response.

HP Inc. asserts the following general privileges, protections and objections with respect to the Request. Our aim is to cooperate with your investigation and we will, of course, comply with any lawful future requests that are within EPA's authority.

1. HP Inc. asserts all privileges and protections it has in regard to the documents and other information sought by EPA, including the attorney-client privilege, the attorney work product doctrine, all privileges and protections related to materials generated in anticipation of litigation, the settlement communication protection, trade secret protections, and any other privilege or protection available to it under law.
2. HP Inc. asserts that the information being provided herein is confidential business information within the meaning of 40 C.F.R. § 2.203(b), and is therefore subject to the protections set forth in 40 C.F.R. Part 2, Subpart B.
3. HP Inc. objects to Instruction 3 in that it purports to require HP Inc. to seek and collect information and documents in the possession, custody or control of individuals not within the custody or control of HP Inc. EPA lacks the authority to require HP Inc. to seek information not in its possession, custody or control.
4. HP Inc. objects to Instruction 7 on the ground that EPA has no authority to impose a continuing obligation on HP Inc. to supplement these responses.
5. HP Inc. objects to the definition of "identify" in Definition 6 to the extent that the definition encompasses home addresses of natural persons. Subject to this objection, current HP Inc. employees and any other natural persons are identified by name and corporate address. HP Inc. requests that any contacts with any current or former HP Inc. employees identified in these responses or the related documents be initiated through the undersigned.
6. HP Inc. objects to the definition of "document" or "documents" in Definition 7 to the extent it extends to documents not in HP Inc.'s possession, custody, or control. HP Inc. disclaims

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any responsibility to search for, locate, and provide EPA copies of any documents “known by HP Inc. to exist” but not in HP Inc.’s possession, custody, or control.

Notwithstanding these objections, and without waiving them, HP Inc. has undertaken a diligent and good faith effort to locate and furnish documents and information in its possession, custody, and control that are responsive to the Request.

### **RESPONSES TO SEPTEMBER 16, 2015 EPA REQUEST**

1. *State the correct legal name and mailing address of Hewlett-Packard.*

**Response:**

Effective October 31, 2015, Hewlett-Packard Company was renamed HP Inc.

HP Inc.  
1501 Page Mill Road  
Palo Alto, CA 94304

2. *If Hewlett-Packard wishes to designate an individual for all future correspondence concerning this Site, include any legal notices, please so indicate here by providing that individual's name, address, telephone number, and FAX number.*

**Response:**

Christopher Roe, Esq.  
Fox Rothschild LLP  
747 Constitution Drive, Suite 100  
Exton, PA 19341  
croe@foxrothschild.com

Jennifer Morris, Esq.  
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3. *For Hewlett-Packard, please provide:*
- a. *The date of incorporation;*
  - b. *State of incorporation; and*
  - c. *Agent for service of process.*

**Response:**

Hewlett-Packard Company was incorporated on August 18, 1947 under the laws of the State of California. On February 11, 1998, Hewlett-Packard Company was incorporated under the laws of the State of Delaware. As noted above, effective October 31, 2015, Hewlett-Packard Company was renamed HP Inc. *See* Certificate of Amendment to the Certificate of Incorporation of Hewlett-Packard Company at HP-000001.

HP Inc.'s registered agent is The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801.

4. *If the Hewlett-Packard currently is, or was at any time, a subsidiary or affiliate of another corporation or other business entity, identify each of those other entities and each entity's Chief Executive Officer, President, and Chairman of the Board.*

**Response:**

Hewlett-Packard, now known as HP Inc., was never a subsidiary of another corporation or business entity. Hewlett-Packard's principal subsidiaries and affiliates, as of October 31, 2014 are identified in Exhibit 21 to Hewlett-Packard's annual report filed with the Securities and Exchange Commission ("SEC") on December 17, 2014, which is attached at HP-000002.

5. *Describe the nature of (a) the acquisition of Digital by Compaq, and (b) the merger of Compaq and Hewlett-Packard, i.e., stock, assets transactions or other type of acquisitions.*
- a. *Describe the nature of the sale and/or transaction of each;*
  - b. *State if the transaction consisted of a merger, consolidation, sale or transfer of assets, and submit all documents relating to such transaction, including all documents pertaining to any agreements, express or implied, for the purchasing corporation to assume the liabilities of the selling corporation.*
  - c. *Did Hewlett-Packard retain the liabilities of Compaq or Digital for events prior to the sale?*



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- d. *Is Hewlett-Packard the successor to any of Digital's and Compaq's liabilities, including those under CERCLA?*
- e. *Describe the nature of Hewlett-Packard's succession of liabilities for both Digital and Compaq and provide the relevant documentation.*
- f. *Did Hewlett-Packard or Compaq sell or otherwise divest itself of any stock, assets, or other interest in Digital?*

5(a) “the acquisition of Digital by Compaq”

a. As set forth in Compaq’s Form 8-K filed with the SEC on February 11, 1998, DEC and Compaq entered into an Agreement and Plan of Merger on January 25, 1998, whereby Compaq acquired DEC through its merger with a Compaq subsidiary. On June 11, 1998, DEC merged with and into the merger subsidiary (Compaq Merger, Inc.), with DEC being the surviving corporation and a wholly-owned subsidiary of Compaq. In 1999, DEC was merged into Compaq. At the time of Compaq’s acquisition of DEC, Digital-PR was no longer a subsidiary of DEC as it was dissolved in accordance with the laws of the State of Delaware on June 26, 1995. Therefore Digital-PR was not acquired by Compaq.

b. The following documents relating to the acquisition of Digital by Compaq are being submitted with this response:

1. Compaq’s Form 8-K filed with the SEC on February 11, 1998, which contains the January 25, 1998 Agreement and Plan of Merger at Exhibit 2.1, is attached at HP-000213.
  2. Exhibit 21 to DEC’s annual report on Form 10-K for the fiscal year ended June 28, 1997 filed with the SEC September 17, 1997 that identifies the subsidiaries in existence at the time of the merger with Compaq is attached at HP-000251.
  3. Digital-PR’s Certificate of Dissolution filed on June 26, 1995 with the Delaware Secretary of State is attached at HP-000347.
- c. *See response to 5(b), below.*
  - d. *See response to 5(b), below.*
  - e. *See response to 5(b), below.*

f. *See response to 5(b), below.*

5(b) “the merger of Compaq and Hewlett-Packard”

a. On September 4, 2001, Hewlett-Packard, Heloise Merger Corporation and Compaq entered into an Agreement and Plan of Reorganization, whereby Compaq merged with and into a merger subsidiary of Hewlett-Packard (Heloise Merger Corporation). Compaq merged into Heloise Merger Corporation on May 3, 2002, and subsequently was integrated into Hewlett-Packard.

b. The transaction between Hewlett-Packard and Compaq was a merger. Compaq’s Form 8-K dated September 4, 2001 attaching as Exhibit 2.1 the Agreement and Plan of Reorganization, dated September 4, 2001 and as Exhibit 99.1 the Text of Joint Press Release of Compaq Computer Corporation and Hewlett-Packard Company, dated September 3, 2001 is attached at HP-000350.

c. As a result of the merger between Hewlett-Packard and Compaq, with Hewlett-Packard being the surviving entity, Hewlett-Packard assumed Compaq’s liabilities, including any liabilities for events prior to the merger. Similarly, as a result of Compaq’s merger with DEC, Compaq assumed DEC’s liabilities, including for events prior to the merger. However, as discussed above, Digital-PR was dissolved prior to the acquisition of DEC by Compaq. DEC is not a successor in interest to Digital-PR and therefore Compaq did not assume any liabilities related to Digital-PR. Thus, Hewlett-Packard (now named HP Inc.) did not assume any liabilities related to Digital-PR by virtue of its merger with Compaq.

d. As noted above, Digital-PR was an independent subsidiary corporation of DEC<sup>4</sup> and Digital-PR dissolved in 1995. Accordingly, DEC is not a successor to Digital-PR’s potential liabilities stemming from its leases of the CCL Lot and the former Baytex Lot. Therefore, neither Compaq nor HP Inc. is a successor to any liabilities of Digital-PR as a result of the merger agreements identified in response to this Request.

e. *See response to c and d, above.*

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<sup>4</sup> *See* FN 2, *supra*.

f. As previously described, Digital-PR leased the CCL Lot and the former Baytex Lot, not DEC. Since neither Compaq nor Hewlett-Packard (now named HP Inc.) acquired Digital-PR, they did not and could not have divested or sold any interest related to Digital-PR.

6. *Describe the condition of the Facility (a) at the time Digital commenced operations at the Facility, and (b) when Digital vacated the Facility. Provide all available photos and/or documents that would substantiate this.*

**Response:**

(a) HP Inc. has not identified any information or documentation regarding the condition of the CCL Lot or the former Baytex Lot at the time Digital-PR commenced operations at either the CCL Lot or the former Baytex Lot.

(b) The only documentation HP Inc. is aware of regarding the condition of the CCL Lot and the former Baytex Lot when Digital-PR terminated its leases is from information provided to us by EPA. Specifically, EPA provided to us documentation from PRIDCO's response to EPA's May 19, 2015 104(e) Request for Information ("PRIDCO's response"), including the following:

1. A 1992 inspection performed by PRIDCO in accordance with the provisions of the Digital-PR lease, which did not identify any evidence of contamination at the CCL Lot. As a result of that inspection, Digital-PR was let out of the lease in accordance with its terms.
2. An undated handwritten memo regarding an inspection of the former Baytex Lot and CCL Lot, which did not identify any evidence of contamination at either building.

7. *Before Digital commenced operations at the Facility, did Digital or any of its agents, officers, or employees enter into any arrangements to investigate the physical and/or environmental conditions at the Facility? If so, please provide copies of all reports, analyses and characterizations relating to the physical and/or environmental conditions at the Facility.*

**Response:**

HP Inc. has not located any documentation regarding Digital-PR's operations at either the CCL Lot or the former Baytex Lot and has not otherwise identified any information



regarding whether Digital-PR or any of its agents, officers, or employees entered into any arrangements to investigate the physical and/or environmental conditions at the CCL Lot or former Baytex Lot before commencing operations.

8. *Describe in detail the nature of the business and the production processes conducted by Digital at the Facility until such time as operations ended, including:*
- a. *The date such operation commenced and concluded;*
  - b. *The types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location; and*
  - c. *A description of the generation, storage, placement, disposal or treatment of wastes at the Facility by date.*

**Response:**

From documentation in PRIDCO's response provided to us by EPA, it appears that Digital-PR (not DEC), leased the CCL Lot from 1971 through 1992 and the former Baytex Lot from 1982-1987.

HP Inc. has not located any documentation regarding Digital-PR's operations at the either the CCL Lot or former Baytex Lot. However, HP Inc. did identify several current HP Inc. employees, who were coincidentally former Digital-PR employees, having left Digital-PR prior to or when Digital-PR closed its operations in 1992 to pursue other opportunities. None of the current HP Inc. employees was employed at the former Baytex Lot or CCL Lot, but some had limited contact with the buildings on those lots after 1980 and before 1992. Below is a summary of information provided by HP Inc. employees regarding the nature of Digital-PR's activities at the CCL Lot and former Baytex Lot:

- CCL Lot
  - None of the employees interviewed had knowledge of Digital-PR activities at this building.
- Former Baytex Lot
  - This building may have been known as "Building 6" within Digital-PR;
  - The building was reportedly a warehouse used for the storage of raw materials and also included offices; and
  - This building was also a reportedly a staging area for finished products to be staged and shipped out.



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9. *If there were any changes in the nature of Digital's business and/or the production processes at the Facility, explain the changes and the dates of such changes.*

**Response:**

See Response to Request No. 8, above.

10. *During the time that Digital operated at the Facility, please provide lists for:*
- a. *All the chemicals that were used at the Facility. Provide the quantity for each chemical that was used on a yearly basis. Relate the use of these chemicals to the manufacturing process;*
  - b. *All wastes that were generated at the Facility. Provide the quantity of each waste that was generated on a yearly basis; and*
  - c. *All chemicals and wastes that were stored at the Facility, the method of storage (e.g., drums, tanks, etc.), and the location of storage.*

**Response:**

As noted throughout this response, HP Inc. has not located any documentation regarding Digital-PR's operations at the CCL Lot or the former Baytex Lot, including any documentation regarding chemicals that were used by Digital-PR at either the CCL Lot or the former Baytex Lot. HP Inc. did identify several current HP Inc. employees, who were coincidentally former Digital-PR employees, having left Digital-PR prior to or when Digital-PR closed its operations in 1992 to pursue other opportunities. None of the current HP Inc. employees was employed at the former Baytex Lot or CCL Lot, but some had limited contact with the buildings on those lots after 1980 and before 1992. Below is a summary of recollections provided by HP Inc. employees regarding chemicals and wastes at the CCL Lot or former Baytex Lot:

- CCL Lot
  - The employees interviewed had no information about any chemicals that may have been used or wastes that may have been generated by Digital-PR at this building.
- Former Baytex Lot
  - Reportedly, this was operated as a warehouse and a DuPont solder mask was stored within this building;

- In the early 1980s the solder mask was a paste, and in the late 1980s it was a dry film; and
- Raw materials stored in this building were reported to include sulfuric acid and polymers.

11. *For the time that Digital operated at the Facility, explain how any chemical wastes that were generated were disposed of Provide manifests or shipping papers to document.*

**Response:**

HP Inc. has not identified any documentation regarding Digital-PR's activities at the CCL Lot or former Baytex Lot and has not identified any information regarding what chemical wastes, if any, were generated at the CCL Lot or the former Baytex Lot, or how any such wastes were disposed.

12. *Did Digital store or stockpile any industrial wastes at the Facility? Did any of the Digital's agents, representatives, officers or employees enter into arrangements of any kind relating to the treatment, storage or disposal of industrial wastes? If so, explain all such arrangements, with whom they were made, the chemical names and the appropriate volumes of the industrial wastes, and the time period such arrangements were in effect. Provide copies of all documents that are relevant to your response to these questions.*

**Response:**

HP Inc. has not identified any documentation regarding Digital-PR's activities at the CCL Lot or the former Baytex Lot and has not identified any information regarding what industrial wastes, if any, were generated at those Lots, or how any such wastes were handled, treated, stored or disposed. A current HP Inc. employee recalls that a compactor for packaging materials was present at the former Baytex Lot during Digital-PR's operations.

13. *Did Digital use or install any underground or aboveground storage tanks on the properties? If yes, please provide the answers and all documents that are relevant to your responses:*
- a. *Please supply the date when they were installed, their size and material of construction, where they were installed, for what purpose, and what chemicals/wastes were stored in them.*

- b. *Were any of these tanks ever removed or did they ever leak?*
- c. *Were any of the tanks already present at the Facility prior to Digital's operations?*

**Response:**

HP Inc. has not identified or located any documents or information regarding underground or aboveground storage tanks at the CCL Lot or former Baytex Lot. The former Digital-PR employees interviewed did not recall any information about underground or aboveground storage tanks.

14. *During Digital's operations at the Facility, describe all leaks, spills, or releases at or from the Facility of materials that were or may have been hazardous, toxic, flammable, reactive, or corrosive, or may have contained hazardous substances, including, but not limited to:*
- a. *The date of each such occurrence;*
  - b. *The specific location at the Facility of each such occurrence; and*
  - c. *The materials that were involved in each such occurrence in terms of the nature, composition, color, smell, and physical state (solid or liquid) of such material.*

**Response:**

HP Inc. has not identified documents or information regarding any leaks, spills or releases at or from either the CCL Lot or the former Baytex Lot, except that one employee recalls that less than a gallon container of solder mask was crushed in the compactor located at the former Baytex Lot on one occasion and was immediately cleaned up.

15. *During its operation of the Facility, did Digital ever conduct any type of water, soil, or sediment sampling at or near the Facility for purposes of identifying whether there had been a release of any chemical(s) to the environment and/or in compliance with or response to any Federal or Commonwealth environmental regulation(s)? Provide all reports or analytical data that would substantiate this.*

**Response:**

HP Inc. has not identified any documentation regarding Digital-PR's activities at the CCL Lot or former Baytex Lot and has not identified any information regarding whether

Digital-PR ever conducted any environmental sampling at or near the CCL Lot or former Baytex Lot.

16. *During Digital's operations at the Facility, were soils remediated, excavated or removed from the Facility?*
- a. *If yes, what was the source of the material that was used to backfill the excavation?*
  - b. *Please provide the vendor/location from where the backfill material was obtained and what efforts were taken to determine whether the material was clean.*
  - c. *Detail the effort and provide documentation to substantiate your response, including photographs, reports, and analytical data.*

**Response:**

HP Inc. has not identified or located any information regarding removal, excavation or remediation of soils from either the CCL Lot or former Baytex Lot during Digital-PR's operations at either lot.

17. *Identify and provide copies of all insurance policies and indemnification agreements held or entered into which arguably could indemnify Digital, Compaq, and/or Hewlett-Packard against any liability which it may be found to have under CERCLA for releases and threatened releases of hazardous substances at and from the Site. In response to this request, please provide not only those insurance policies and agreements which currently are in effect, but also include those which were in effect during the years Digital operated at the Facility.*

**Response:**

HP Inc. has found documentation that DEC had Pollution Legal Liability Claims Made insurance policies that included Digital-PR for June 28, 1993 through June 28, 1999. These policies are at HP-000404 through HP-000492.

18. *Provide the name, address and phone number of all persons that Digital employed during the time Digital leased at the Facility that would be familiar with the Digital's operations; waste storage and disposal practices; and any remediation, excavation, or removal of soil from the properties.*

**Response:**

HP Inc. has not identified any personnel that Digital-PR employed during the time Digital-PR leased either the CCL Lot or the former Baytex Lot that are familiar with Digital-PR's operations, waste storage and disposal practices or any remediation, excavation or removal of soil from or at the CCL Lot or the former Baytex Lot.

19. *In the event that you have any additional information or documents which may help EPA identify other companies that may have contributed to contamination in the ground water plume at the San German Ground Water Contamination Site, please provide that information and those documents, and identify the source of your information.*

**Response:**

HP Inc. has not identified any additional information or documents that may assist EPA with identifying other companies that may have contributed to contamination in the ground water plume at the Site.

20. *Please state the name, title and address of each individual who assisted or was consulted in the preparation of your response to this CERCLA Request for Information. In addition, state whether this person has personal knowledge of the information in the answers provided.*

**Response:**

HP Inc.'s Risk Management, Environmental, Health & Safety and Global Records Management departments, along with the Office of General Counsel, assisted with locating potentially responsive information, which was provided to the undersigned for review and analysis. In addition, the individuals identified below, each of whom were former Digital-PR employees at some point between 1980 and 1992, when Digital-PR shut down its operations, were consulted to provide factual information in response to this Request. None of the current HP Inc. employees was employed at the former Baytex Lot or CCL Lot, but some had limited contact with the buildings on those lots after 1980 and before 1992.

As noted in the general objections, HP Inc. requests that any contacts with current or former HP Inc. employees identified in these responses or the related documents be initiated through the undersigned.



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Name	Title	Corporate Address	Personal Knowledge
REDACTED	Customer Assurance Program Manager	HP Inc., REDACTED	Yes
REDACTED	Program Manager	HP Inc., REDACTED	Yes
REDACTED	Product Engineer	HP Inc., REDACTED	Yes
REDACTED	Engineering Project/Program Manager	HP Inc., REDACTED	No
REDACTED	Product Manager	HP Inc., REDACTED	No
REDACTED	Supply Chain Manager	HP Inc., REDACTED	No

Sincerely,

Christopher M. Roe

cc: Gez Bushra  
Enclosures